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March 21, 2024

**BY ECF**

Hon. Paul A. Engelmayer  
United States District Judge  
United States District Court  
Southern District of New York  
40 Foley Square, Room 2201  
New York, NY 10007  
EngelmayerNYSDChambers@nysd.uscourts.gov

Re: Maria Elena Swett Urquieta v. John Francis Bowe,  
1:24-cv-01379-PAE (S.D.N.Y.)

Dear Judge Engelmayer:

We write as counsel to Petitioner in the above-referenced action. Pursuant to Your Honor's March 1, 2024 Order (ECF No. 9) in the above-referenced action concerning approval of redactions, we write to respectfully request the following categories of sensitive information be permitted to be redacted from the following documents where indicated, under Your Honor's Individual Rules and Practices in Civil Cases, Rules 4.B.1. and 4.B.2.; Fed. R. Civ. P. 5.2(a); Notice Regarding Privacy and Public Access to Electronic Civil and Criminal Case Files, United States District Court for the Southern District of New York; Standing Order, ECF No. 1, *In re: Electronic Filing Under Seal In Civil And Miscellaneous Cases*, No. 1:19-mc-00583-CM (S.D.N.Y. Dec. 19, 2019); Electronic Case Filing Rules and Instructions for the United States District Court for the Southern District of New York, July 24, 2023 Edition; and the E-Government Act of 2002:

1. The name of a minor child, which is considered "sensitive information" that should not be included in submissions to the Court under, *inter alia*, the Court's Individual Rules and Practices in Civil Cases, Rule 4.B.1. *See* Chilean Custody Order at 1–2; Birth Certificate at 1, 3; Travel Authorization at 2, 4, 5, 8, filed contemporaneously herewith.
2. A home address without the city and state, which is considered "sensitive information" that should not be included in submissions to the Court under, *inter alia*, the Court's Individual Rules and Practices in Civil Cases, Rule 4.B.1. *See* Verified Amended Petition for Return of Child ¶¶ 14, 39; Birth Certificate at 1, 3, filed contemporaneously herewith.

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3. The month and date of birth of a minor child, which is considered “sensitive information” that should not be included in submissions to the Court under, *inter alia*, the Court’s Individual Rules and Practices in Civil Cases, Rule 4.B.1. *See* Verified Amended Petition for Return of Child ¶ 18; Stipulation and Custody Order at 2 ¶ 1, 6 ¶¶ 1–2; Birth Certificate at 1, 3; Travel Authorization at 4, filed contemporaneously herewith.

We appreciate the Court’s attention to this matter and am available if the Court has any questions.

Respectfully submitted,

/s/ Jacob Lewis

Jacob Lewis

GRANTED.

SO ORDERED.



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PAUL A. ENGELMAYER  
United States District Judge  
March 21, 2024